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June 30, 2011

Clerk of Court  
United States District Court  
Western Division - Roybal Federal Bldg  
255 East Temple Street  
Los Angeles, CA 90012

Re: Request for Subpoena to Identify Infringer Pursuant to 17 U.S.C. § 512(h)  
(Our Ref.: TRMP CHN TC-11/01003)

Dear Sir or Madam:

We represent The Trump Organization and Donald J. Trump (collectively, "Trump"). We hereby submit the enclosed request for the Clerk to issue a subpoena to Hurricane Electric, Inc. pursuant to 17 U.S.C. §512(h) requiring it to release information identifying the individual or entity that owns and operates the IP address: 98.126.114.171 at which copyrighted images owned by Trump are being used, without permission or license. The images in question are owned by The Trump Organization.


We have a good faith belief that such use is not authorized by the copyright owner, its agents, or the law, and assert that the information in this Notice of Copyright Infringement is accurate, based on the data available to us. As further set forth in the accompanying Declaration of Todd Martin Pursuant to 17 U.S.C. § 512(h), under penalty of perjury, we certify that we are authorized to act on behalf of Trump in matters involving the online infringement of its copyrighted photographs.

We ask that upon completion of processing this request you (i) contact me at 212-813-8219 to confirm that the subpoena has been issued, and (ii) provide the subpoena that is issued to the representative from CC Solutions Process & Attorney Services who will be the process server for this subpoena. Thank you for your prompt attention to this matter.

Very truly yours,

  
Todd Martin

Enclosures

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